

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

BENJAMIN OROZCO,  
*Plaintiff,*

v.

CRAIG PLACKIS,  
*Defendant*

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Civil Action No. 1:11-cv-703-LY

**DEFENDANT'S EXHIBIT LIST AND WITNESS LIST**

COMES NOW, Defendant, CRAIG PLACKIS in the above-styled and numbered cause and file this, his Exhibit List and Witness List for trial of this cause, and respectfully submits the following Exhibit List and Witness for the trial by jury in this cause:

**I. Defendant's Exhibit List**

The Defendant expects to offer the following as trial exhibits:

- D1:** Craig O's San Marcos Franchise Agreement
- D2:** Articles of Incorporation of Pane E Vino, Inc.
- D3:** Texas Franchise Tax Public Information Report for Pane e Vino, Inc., dated August 10, 2011

**II. Defendant's Witness List**

Defendant expects to call the following witnesses to testify:

1. Craig Plackis
2. Benjamin Orozco
3. Sandra Entjer: (512) 558-2220; 690 Centerpoint Rd., San Marcos, TX 78666
4. Arnold Entjer: (512) 745-0150; 690 Centerpoint Rd., San Marcos, TX 78666

5. Trent Romriell: (512) 565-1126; 8801 N. FM 620, Apt., 1714, Austin, TX 78726
6. Jon Dumaran, Jr.: (512) 699-2481; 109 West Ave., San Marcos, TX
7. Todd Finkel: (512) 680-6863; 3130 Montwood Trail, Austin, TX 78748
8. Rogelio Hernandez: (512) 689-4750; 5306 Peppertree Pkwy, Austin, TX 78744

Defendant may call the following witnesses if the need arises:

1. Roxana Plackis
2. Mike Thibodeaux: (512) 825-8587
3. Sandy Hallett: 220 Kinkajou Trail, Kyle, TX 78640
4. Peter Hardin, District Sales Manager, Sysco Central Texas, Inc.: (512) 627-9576; 1260 Schwab Rd., New Braunfels, TX 78132

Defendant specifically reserves the right to introduce or rely upon witnesses or exhibits contained in Plaintiffs' witness and exhibit lists.

By submitting the above lists, Defendant does not stipulate to the admissibility of all testimony of the witnesses listed or to the authenticity or admissibility of the exhibits. Defendant reserves the right to object to testimony of the witnesses or to the above exhibits, depending on evidentiary rulings by the Court and depending on the purposes for which or manner in which such testimony or exhibits are presented.

Respectfully submitted,

Guillermo Ochoa-Cronfel  
THE CRONFEL FIRM  
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Austin, Texas 78746  
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By: /s/ Guillermo Ochoa-Cronfel  
Guillermo Ochoa-Cronfel  
State Bar No. 15175600  
ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify by my foregoing signature that the above and foregoing document has been served upon all parties listed below via the method indicated below and/or the Court's CM/ECF filing system on July 17, 2012.

Aaron Johnson  
EQUAL JUSTICE CENTER and  
TRANSNATIONAL WORKER  
RIGHTS CLINIC  
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ATTORNEY FOR PLAINTIFF

VIA FIRST CLASS U.S. MAIL